

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ROK ENTERTAINMENT GROUP, INC.	:	Case No. 1:11-cv-02728 (DAB)
	:	ECF CASE
Plaintiff,	:	
	:	
-against-	:	
	:	<b>NOTICE OF</b>
LAURENCE ALEXANDER,	:	<b>MOTION TO DISMISS</b>
	:	
Defendant.	:	
-----X		

PLEASE TAKE NOTICE that upon the Declaration of Laurence Alexander, dated July 6, 2011; the Affidavit of Paul Anthony Oxnard, sworn to July 6, 2011, and exhibit thereto; the Declaration of Clarisse N. Thomas, dated July 6, 2011, and exhibits thereto; and the accompanying memorandum of law in support of this motion, Defendant Laurence Alexander shall move this Court, before the Honorable Deborah A. Batts, United States District Judge, at the U.S. Courthouse, 500 Pearl Street, New York, New York 10007, for an Order dismissing the Complaint of Plaintiff ROK Entertainment Group, Inc. in its entirety, with prejudice, pursuant to Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), and on the ground of *forum non conveniens*, together with such other and further relief as the Court deems proper. The motion shall be made and heard at such time as shall be set by the Court.

Dated: Stamford, Connecticut  
July 8, 2011

Respectfully submitted,

SHIPMAN & GOODWIN LLP

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*Attorneys for Defendant  
Lawrence Alexander*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2011 a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Andrew M. Zeitlin

Andrew M. Zeitlin